## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

JENNIFER VANDERSTOK, et al.,

Plaintiffs,

V.

BLACKHAWK MANUFACTURING
GROUP INC., et al.,

Intervenor-Plaintiffs,

V.

MERRICK GARLAND, et al.,

Defendants.

## DECLARATION OF DARREN PETERS, SR.

- I, Darren Peters, Sr., declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct to the best of my knowledge.
- 1. I am over 18 years of age, competent to testify, and have personal knowledge of the matters stated herein.
- 2. I am the Owner and Chief Executive Officer of Tactical Machining, LLC and have held these positions since Tactical Machining was founded in 2008.
- 3. My descriptions of Tactical Machining's business in previous declarations submitted in this case remain accurate. *See* Docs. 16-1 (Aug. 17, 2022), 55-1 (Aug. 31, 2022).
- 4. The vast majority of Tactical Machining's business—over 90%—consists of producing and selling items that are regulated under the ATF Rule challenged in this case: jigs that can be used to finish the manufacturing process on items colloquially known as "80% Lowers," which it sells both as standalone products and as a package deal with 80% Lowers.

5. Tactical Machining is on pace to lose approximately \$20,000.00 in sales this

month as a direct result of it being unable to sell the jigs and jigs with accompanying 80%

Lowers that make up the bulk of its business.

6. To put this in terms of units sold, before the Rule was promulgated, Tactical

Machining would often sell as many as 150 units (comprising 80% Lowers with jigs, jigs and

80% Lowers separately, and also serialized frames and receivers) in a single weekend. As it has

now been limited to selling only 80% Lowers and serialized frames and receivers, in the whole

last week Tactical Machining sold just 10 units.

7. Based on my current projections, if Defendants are not enjoined from enforcing

the Rule against Tactical Machining, Tactical Machining will likely only be able to continue

operating for approximately four months.

DATED this 15 day of September, 2023

Darren Peters Sr. Owner/CEO

Tactical Machining, LLC